## SHER EDLING LLP

PROTECTING PEOPLE AND THE PLANET

July 12, 2019

<u>Via Online Submission</u>
Regional Freedom of Information Officer
U.S. EPA, Region 5
77 West Jackson Boulevard (MI-9J)
Chicago, IL 60604-3590

**Re:** Freedom of Information Act Request

Dear Custodian of Records,

Under the Freedom of Information Act (FOIA), 5 U.S.C. §552, I am requesting copies of all public records concerning the following subjects, which relate to an ongoing civil suit regarding bee deaths.

As used herein, "records" includes all data and documents (including all electronically stored information or databases), including but not limited to, correspondence, interviews, drafts, notes, investigation materials, photographs, measurements, any interim or final data analysis or summaries, reports, memos, and talking points, among other things.

## **Subjects regarding which records are requested:**

All incident data including aggregated incident data concerning impacts to bees from clothianidin, imidacloprid, and thiamethoxam from 2016 to the present stored the Incident Data System, <u>limited in scope to the State of Ohio</u>.

This public records request includes all documents within respondent's possession, whether or not the requested documents were created internally or by a third party. If any documents are withheld from production, please provide the title and date of each document and explain each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Please provide responsive documents as soon as possible, within 14 days if possible. If production will take more than 14 days, please notify me of the expected timeline for response. If there are any fees for searching or copying these records, please inform me if the cost will exceed \$100.

Should you have any questions or concerns regarding this request, I would be happy to make myself available to speak at (628) 231-2500 or I can be reached at Meredith@sheredling.com or through my paralegal, Casey Vaez at Casey@sheredling.com.

Best,

Meredith Wilensky